

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

TYPHOON TOUCH TECHNOLOGIES,	§	
INC. and NOVA MOBILITY SYSTEMS,	§	
INC.,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Civil Action No. 6:07cv546
	§	
DELL, INC., XPLORE TECHNOLOGIES	§	
CORPORATION OF AMERICA, SAND	§	
DUNE VENTURES, INC., FUJITSU	§	
COMPUTER SYSTEMS CORPORATION,	§	
TOSHIBA AMERICA INFORMATION	§	
SYSTEMS, INC., LENOVO (UNITED	§	
STATES) INC., PANASONIC	§	
CORPORATION OF NORTH AMERICA,	§	
APPLE INC., HTC AMERICA, INC.,	§	
PALM, INC., SAMSUNG ELECTRONICS	§	
AMERICA, INC., NOKIA INC., AND	§	
LG ELECTRONICS USA, INC.	§	
	§	
Defendants.	§	Jury Trial Demanded

**PLAINTIFFS' OPPOSITION TO DEFENDANT SAND DUNE VENTURES, INC.'S
RENEWED MOTION TO DISMISS PLAINTIFFS' SECOND AMENDED COMPLAINT
FOR PATENT INFRINGEMENT FOR LACK OF SUBJECT MATTER
JURISDICTION DUE TO PLAINTIFFS' LACK OF STANDING**

Plaintiffs, Typhoon Touch Technologies, Inc. and Nova Mobility Systems, Inc., hereby respond to Defendant Sand Dune Ventures, Inc.'s ("Sand Dune") Renewed Motion to Dismiss Plaintiffs' Second Amended Complaint for Patent Infringement for Lack of Subject Matter Jurisdiction Due to Plaintiffs' Lack of Standing ("Renewed Motion to Dismiss") and respectfully request the Court deny Defendant Sand Dune's Motion.

For the same reasons indicated in Plaintiffs' Opposition to Defendant's Motion to Dismiss (D. E. # 53), Plaintiffs' Sur-Reply in Support of Plaintiffs' Opposition to Defendant's

Motion to Dismiss (D. E. # 65), and Plaintiffs' Opposition to Defendant's Motion for Leave to File a Response to Plaintiffs' Sur-Reply (D.E. # 79), Defendant's Renewed Motion to Dismiss should be denied.

WHEREFORE, Plaintiffs respectfully request that this Court deny Sand Dune's Renewed Motion to Dismiss in its entirety.

Dated: July 15, 2008

Respectfully submitted,

/s/ Michael J. Truncale

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INC.**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 15th day of July, 2008. All other counsel not deemed to have consented to service in such manner will be served via facsimile transmission and/or first class mail.

/s/ Michael J. Truncale

Michael J. Truncale